LEGRA ACADEMY TRUST

# Whistleblowing Policy

## September 2026

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## 1 Introduction

The Legra Trust is a public body that educates thousands of young people each year; it is comprised of Belfairs Academy and Darlinghurst Academy.

We are committed to conducting our business with honesty and integrity, and we expect staff to maintain high standards in accordance with our staff code of conduct. However, we accept that all organisations face the risk of things going wrong from time to time, or not knowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they occur.

As a public body, the trust will often attract the attention of the media and other organisations and believes that it has a public duty to be open, accessible and accountable to its community. It balances this duty with the need to uphold student and staff confidentiality and will always prioritise the safety and quality of its care for students.

This policy provides a framework for employees, agency workers, consultants or contractors to raise concerns which they believe are in the public interest and may relate to illegal, improper or unethical conduct.

This policy should be used where there are concerns about the consequences for other employees or the public and does not apply to matters relating exclusively to your employment.

## 2 Purpose

This policy sets out the Trust's process for anyone covered by this policy to raise any concerns or issues they believe to be in the public interest, with the confidence that they will be acted upon appropriately. Anyone covered by this policy will be protected from detrimental treatment, i.e. victimisation or dismissal, if they raise concerns.

This policy complies with the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013.

## 3 Definitions

Whistleblowing is the formal raising of concerns that are in the public interest (referred to as public interest disclosures). Examples of concerns that may be in the public interest are shown below in Table 1. This list is not exhaustive.

**Table 1**

| **Public Interest Disclosures** |
| --- |
| • Criminal offences<br>• Failure to comply with legal obligations<br>• Actions which endanger the health or safety of any individual<br>• Actions which cause damage to the environment<br>• Actions which are intended to conceal any of the above<br>• Bribery under the Anti Bribery Policy<br>• Financial fraud or mismanagement |

- Breaches of internal policies, procedures, or the staff code of conduct
- Conduct likely to damage our reputation or financial wellbeing
- Unauthorised disclosure of confidential information
- Negligence
- Deliberate concealment of any of the above

**Definition of a Whistle-blower:**

A whistle-blower is a person who raised a genuine concern relating to any of the above items in table 1. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

## 4 Roles and Responsibilities

### 4.1 Duties of the Trust

**4.1.1 Members and Directors** are responsible for;

- ensuring that all individuals across the trust are aware of this policy.
- efficiently managing any reporting of behaviour that contravenes this policy.
- periodically reviewing this policy with the CEO of the Trust and ensuring it is compliant with all legislation.

### 4.2 Responsibilities of Individuals within the Trust

**4.2. All Trust Staff, Contractors or Consultants** are responsible for:

- abiding by the terms of this policy.
- reporting behaviour that contravenes this policy directly to their Principal/Head of School.

## 5 Process

Anyone covered by this policy is encouraged to raise their concerns with the Principal/Head of School/CEO.

Should you receive a concern, you should:

- clarify what is alleged by the employee
- assess what action should be taken
- record the employee's concern
- you will need to ensure the incident is reported the CEO Legra Trust
- depending on the nature of the concern, the matter may be referred to the police or another independent body
- decisions and any remedial action should be clear and fully documented

The employee must raise the matter with the CEO of the Legra Academy Trust.

Where the employee feels unable to raise the concern with the CEO, they should report to the Chair of the Trust to investigate.

## 6 Confidentiality

Where a concern is raised in confidence, Legra Trust will protect the identity of the whistle-blower wherever possible. However, there will be circumstances where this is not possible, as for example where the whistle-blower is an essential witness, and we would be unable to investigate a situation further without revealing the whistle-blower's identity. Should such a situation arise, we will discuss this directly with the whistle-blower.

Any concerns raised anonymously will be considered but may prove more difficult or impossible to investigate due to the anonymous status.

We do not encourage anyone to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from the whistle-blower. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about their identify should come forward to the CEO or Chair of the Trust.

## 7 Written Records

Written records of concerns raised and their outcomes will be maintained by the CEO Legra Trust. This will be in a form which does not breach employee confidentiality.

## 8 Investigation and outcome

- Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- If we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower will be subject to disciplinary action.

## 9 If you are not satisfied

- While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in section 12.

## 10 External disclosures

- The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

- The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, 'Protect', operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are below in section 12.

- Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in section 12 for guidance.

## 11 Protection and support for whistle-blowers

- It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

- Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chair of the Trust immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

- You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistle-blower could have a right to sue you personally for compensation in an employment tribunal.

- A confidential support and counselling hotline 'Protect' is available to whistle-blowers who raise concerns under this policy. Their contact details are set out in section 12 this policy.

## 12 Contact list

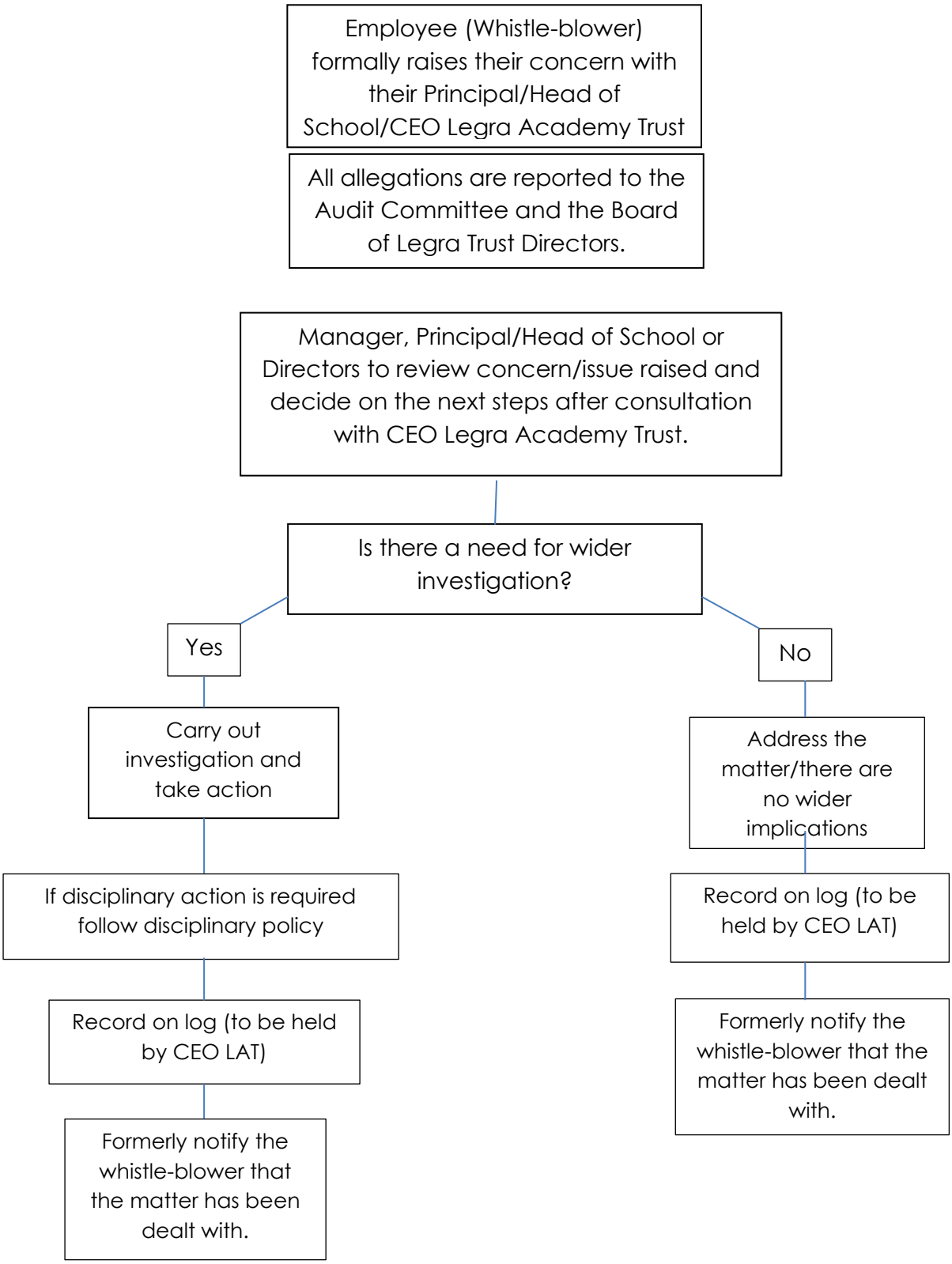
**Bev Williams, CEO Legra Academy Trust**
**T:** 07730 760148 **e:** bev.williams@legratrust.org.uk

**Clerk to the Legra Academy Trust**

**E: info@legratrust.org.uk**

**Protect Charity:**
**T:** 020 3117 2520 **w**: https://protect-advice.org.uk/contact-us

## FLOW CHART


Employee (Whistle-blower) formally raises their concern with their Principal/Head of School/CEO Legra Academy Trust
All allegations are reported to the Audit Committee and the Board of Legra Trust Directors.
Manager, Principal/Head of School or Directors to review concern/issue raised and decide on the next steps after consultation with CEO Legra Academy Trust.
Is there a need for wider investigation?
Yes
No
Carry out investigation and take action
If disciplinary action is required follow disciplinary policy
Record on log (to be held by CEO LAT)
Formerly notify the whistle-blower that the matter has been dealt with.
Address the matter/there are no wider implications
Record on log (to be held by CEO LAT)
Formerly notify the whistle-blower that the matter has been dealt with.